

## **ST5 Sociologie du vote à distance**

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### **Reactive Limits to Diaspora Enfranchisement: Categories, Causes and Cases**

#### **Abstract**

This paper differentiates between proactive and reactive limits to diaspora enfranchisement. Key in this differentiation is the timing of limit adoption and/ or implementation. The categorization of reactive limits presented here seeks to facilitate a better understanding of what causes such limits and what effect they have on diaspora electoral participation. A preliminary case study analysis reveals reactive limits are mostly rooted in political and electoral interests, along with normative considerations and deceptive signaling strategies.

“The human face of globalization” (Randall Kuhn), migration has steadily increased over the past decades and shows no signs of slowing down. As this phenomenon grows, the relationship between sending states and migrant citizens has become an increasingly salient matter. Since most migration worldwide is motivated by economic interests, naturalization of immigrants is a tenuous, oftentimes unlikely event. Migrants retain the citizenship of sending states and, presumably, the rights afforded by said citizenship. One such right pertains to diaspora enfranchisement, a phenomenon that started with Australia in the early 1900s and has increased in scope and frequency, especially since the early 1990s, to the point that all but 45 countries in the world today afford their diasporas the right to vote in external elections.

However widespread in the past two decades, diaspora enfranchisement laws almost always contain some limits that make the voting process more complicated for emigrants than for citizens at home. Such limits range from special registration requirements, to procedural hurdles, or to representation restrictions. Even in well-established democracies, such as Western European countries, such constraints are in place. A particular puzzle is why some countries are choosing to restrict the expatriate franchise even as most other countries are moving in the opposite direction, creating or expanding ballot access for their overseas citizens. Very few studies examine these limits and how exactly they come about. Nor is it clear if, why and under which circumstances limits are implemented after being legislated. More so, the literature lacks a classification of limits based on severity and the timing of limit adoption and implementation.

This study draws a distinction between limits included in original diaspora enfranchisement laws (called here proactive limits) and limits added after enfranchisement happened (called here reactive limits). The importance of the timing distinction lies in its potential to explain what motivates the creation of limits and how experience and expectations shape such restrictions.

The study generates a reactive limits typology and finds reactive limits to be generally more restrictive than proactive limits. Why is this the case? What causes reactive limits? Can some enfranchisement models also help explain why some countries go back and restrict or revoke their decision to enfranchise diasporas in an age when globalization shows no signs of abating and emigration is still a growing trend worldwide?

To answer these questions, this study examines several countries that have implemented reactive limits, grouping them according to the original typology that ranks them from the strictest limit (the full retrenchment of diaspora voting rights), to the most lenient limit (sunset provisions for long term emigrants). Next, the study examines possible causes for reactive limits, drawn from the enfranchisement literature: economic cost-benefit considerations, norm diffusion models, electoral and political calculations and diaspora rights considerations. Results show that stronger reactive limits to overseas voting occur mostly as a result of political calculations and electoral benefits. Also, in those countries where neighbors have weaker democratization scores, reactive limits are more severe.

### **Enfranchisement as End Game? Why Implementation and Limits Matter**

Until recently, studies of diaspora voting rights extensively focused on the causes and circumstances leading sending states to enfranchise their diasporas. The focus on determinants of

enfranchisement left little room for studying variations in voting rights and procedural implementation, even though such variation is substantial.

Given the lack of treaties, agreements or other formal international diaspora voting standards (Grace, 2007; Lafleur, 2013), each country decides the type and number of elections open to diaspora participation, as well as the registration and voting procedure. Such provisions can and do vary significantly across countries: some are quite lenient and allow diasporas to vote in most, if not all, elections, while others enforce strict registration procedures and limit diasporas to one or two elections (usually legislative and/or presidential votes).

One commonality is that all countries do have such limits in place and treat citizens abroad differently than citizens at home. In fact, no country meets the gold standard of diaspora inclusion in all types of elections, while also allowing a comparably fair representation of emigrants in the national parliament, and allowing for the most expedient registration and voting procedures: postal, proxy and/or electronic (Blais et al., 2001; Nohlen and Grotz, 2007; Shaw, 2007; Arrighi et al., 2013). Even Western European states, some of the world's most established democracies, which, true to reputation, would be most likely to meet such golden standards, included such limits in their initial diaspora enfranchisement legislation (Arrighi and Hutcheson, 2015).

An impressive variety of limits are currently being applied to diaspora voting in numerous countries: election types (legislative, presidential, local, referenda, supra-national, other) geographic constraints and special representation provisions (Lafleur, 2015). Diaspora votes are allowed by most countries in general elections which, depending on each country's system of government, may be either legislative elections, presidential elections, or both. Other countries, such as some EU member states or New Zealand, also open up supra-national or regional elections to their diasporas, as well as national referenda and other elections. Combinations vary widely across countries (IDEA 2007; Gamlen, 2015; Hutcheson and Arrighi, 2015).

Similar to some cases of internal (in country) voting, registration and procedural limits can shape diaspora turnout and election results: the more complicated the requirements, the less likely the participation. At a time when several countries, especially in Europe, allow for automatic registration, most countries in Latin America, North Africa (with the exception of Tunisia and Egypt) and the Middle East require active registration for diasporas. While often officially claimed to be necessary to preserve the integrity of the electoral process, active registration or procedural requirements for those who vote abroad create added difficulties: the need for extensive travel, additional permits, or both. Active registration requirements can be in place for each individual election, or may have to be completed at certain time intervals. In any scenario, active registration places additional bureaucratic demands and pecuniary and time pressures on emigrants, while automatic registration means that emigrants can vote at any time in any election by carrying a valid national ID or passport at the time of the vote (Jaulin, 2011; Lafleur, 2015).

Besides registration requirements, voting procedures can also be limits to diaspora participation. While some countries allow diaspora members to vote only if they are physically present in their home country when elections happen, others allow a combination of all forms of ballot-casting procedures: personal in-home-country vote, personal voting abroad in consulates or embassies, proxy voting, postal voting and e-voting. Greece embodies an example of extremely restrictive procedural policies, which are unique in the EU: its citizens can vote only if they are in Greece at the time of the election (Baubock, 2006). Many EU countries allow a combination of multiple

ballot-casting options while, at the extreme, France places no procedural limits on its emigrants (Hutcheson and Arrighi, 2015).

Procedural geographic constraints come into play when some diasporas are concentrated in certain regions of the world, such as neighboring countries, and sending states invoke pecuniary and efficiency concerns to justify organizing elections only in such areas where the cost-to-vote-cast ratio would be the lowest possible. Such initiatives are usually entertained by developing, sub-Saharan states: Cameroon, Mozambique, Kenya and Zambia, among others

Limits also exist to the type of legislative representation afforded diasporas. Some countries created special districts for diaspora representation in their national parliaments, while thirteen of them even allow emigrants to run for those seats (Lafleur, 2015). Such districts are allocated by geographic boundaries (generally by region or continent) that ignore emigrant numbers and thus lead to either over- or under-representation of individual voters. For example, in Romania's 2012 legislative elections, four seats were reserved for diaspora representatives, each assigned by continent: one for Europe, one for Asia, one for Africa and the Middle East, one for North and South America. This provision created high representation discrepancies: there is one legislator per millions of emigrants living in Western Europe as for the few thousands living in Asia or Africa. Thus, such special representation provisions limit the impact of diaspora votes, as they do not adjust in accordance to constituent numbers, leading many times to the under-representation of individual emigrant constituents.

Other countries assimilate overseas diaspora votes to either a single in-country district, adding external to internal votes, or add them to emigrants' latest in-country residence districts (Hutcheson and Arrighi, 2015). Single in-county assimilation of external votes (as was the case with Romania's 'Bucharest District 1 votes' in the 1990s) is particularly restrictive as its result is that the entire diaspora and some in-country constituents are represented by one or very few legislators and thus under-represented when compared to other citizens. In this scenario, under-representation disincentives voter participation. The instances of latest in-country residence district voting (as is the case in New Zealand) are the most equitable form of representation for obvious reasons.

While not much has been written about limits, even fewer studies have explored what causes them (Lafleur, 2015) and none have examined the impact of limits' timing on diaspora electoral participation. It is the goal of this paper to differentiate between limits by examining the timing of their creation and adoption. For this purpose, this study will differentiate proactive and reactive limits. It will further categorize reactive limits and seek to explore what causes such limits and what impact they have on diaspora electoral participation.

### **Reactive Limits: Categories, Cases<sup>1</sup> and Causes**

Most countries have in place some limits tailored specifically for diasporas, as detailed by the literature presented above. Decisions that seemingly inform these limits can vary from pecuniary to procedural, to electoral interests or normative considerations. Original enfranchisement laws automatically contain at least a few such limits, which are rooted in governments' expectations of what diaspora voting might entail, or in their observations of other countries' experiences with diaspora voting. That is to say, limits included in original laws are not based on a country's direct

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<sup>1</sup> Not all cases mentioned in the different categories are discussed in detail. This is the case due to some information still being gathered, or some cases being repetitive.

experience with diaspora voting. Before electoral voting patterns or turnout results can even be monitored, and while costs can only be estimated, legislators allow mere assumptions about diaspora voting to inform their decisions about how to limit enfranchisement laws.

In only a few instances, some limits are added after initial enfranchisement, and are presumably based on a country's own prior experiences with external voting. The distinction drawn here is thus between limits built in the original enfranchisement laws (from now on referred to in this paper as “proactive limits”) and limits added to the original legislation after its implementation (from now on referred to as “reactive limits”). This distinction revolves around timing and, more importantly, causes. Proactive limits are based on assumptions and likely the experiences of other countries and other electorally active diasporas. Reactive limits are rooted in direct experiences once a law has been passed. That is, while for the former, laws are based on assumptions, for the latter, they are (at least presumably) based on concrete experiences with cost, turnout, electoral behavior and other factors.

The importance of the distinction between proactive and reactive enfranchisement limits is that the latter may reflect more focused intent in shaping or controlling diaspora participation. Because reactive limits are put in place when a feared scenario becomes reality, or is very close to becoming reality, they tend to limit diaspora participation much more than proactive limits do. In countries where enfranchisement happened, proactive limits are not as restrictive, as reactive limits. The latter lead to a de jure or de facto revocation of voting rights for large segments of the diaspora, even though they range in severity from full retrenchment for all citizens, to residency sunset provisions for long-term emigrants.

Reactive limits can be categorized by severity, or by the number of emigrants they disenfranchise de jure, de facto, or both. Based on these considerations, four categories of disenfranchisement can be distinguished: full retrenchment de jure and de facto; full limits de facto, but not de jure; partial limits de jure, or de facto; and residency sunset provisions.

### ***Category 1: Full retrenchment (de jure and de facto)***

Full retrenchment (de jure and de facto) completely revokes diaspora voting rights. This means that emigrants who had previously been allowed to vote in national elections are excluded from the vote at least one electoral cycle after their initial enfranchisement, and the government no longer organizes elections abroad, or allows its citizens with foreign residency the vote. Full retrenchment is in fact the legally sanctioned, complete disenfranchisement of diaspora members and it is quite rare. Morocco (1993), Armenia (2007) and the Cook Islands (2003) have completely revoked the diaspora's right to vote after it had been actively involved in at least one election.

In the case of Armenia, a state with an “in-country population of 3 million, with a population of co-ethnics residing abroad at least twice as large”, the government enfranchised the diaspora in 1991, when the country gained its independence from the Soviet Union (Rhodes and Hartutyunyan, 2010, pp.483-4). However, in 1994, emigrants with dual citizenship were denied voting rights, only to regain them in 2005, when the ban was removed through a constitutional amendment. The Electoral Law adopted in 2007 acknowledged once more the right of all Armenians to hold dual citizenship, but abolished external voting. Emigrant dual citizens maintain some rights, but not the one to be involved in Armenian politics by voting or running for office.

Similarly to the case of Armenia, most Cook Islanders have left the country and now reside abroad, mostly in New Zealand (60,000) and Australia (45,000); only 10,077 still live in the country (IDEA 2007). Emigrants were first enfranchised in 1966 and, in 1981, the legislature voted to create a special constituency for islanders living abroad and to extend the right to vote to all who were willing to register with the Cook Islands authorities. In 1998 the Commission of Political Review recommended that the right to vote be allowed only to those who had resided outside the islands for three years or less, and thus reduced the number of eligible voters to about six thousand. In 2003, two thousand islanders signed a petition supporting downsizing initiatives that also included a request for the abolition of the external seat and Parliament. The petition was supported by the largest parties which passed a law completely disenfranchising the island nation's diaspora.

In the case of Morocco, enfranchisement occurred in the 1984 legislative elections. The vote was extended as a result of massive emigration to France and some other Southern European countries. Yet, the diaspora voted only once in nine years, since legislative elections were repeatedly postponed. By the time new legislative elections took place, in 1993, the diaspora was no longer included in the process as its voting rights were officially cancelled (Brand, 2010)

### ***Category 2: De Facto Full Limits***

De facto full limits occur in cases when states adopt, but fail to implement, diaspora enfranchisement laws. Thus, even if the laws are on the books, and limits do not exist de jure, the government's decision not to organize elections abroad for one or more electoral cycles translates into de facto full diaspora disenfranchisement. This has happened in several countries: Angola, Gambia, Guinea-Bissau, Yemen, Zimbabwe, Kenya (until 2011) and Mozambique (until 2004).

In Mozambique, even if external voting legislation was first adopted in 1993, the diaspora was repeatedly denied the right to vote until the 2004 elections. In 1997, the National Electoral Commission started the registration process abroad, but eventually did not organize elections outside of the country. In 2000, registration and elections only happened inside Mozambique and emigrant enfranchisement laws were completely ignored. The diaspora could finally register and cast a ballot in the 2004 general election and has been allowed to participate in all general elections organized since (2009 and 2014).

Full de facto limits also occur in Zimbabwe, a country whose constitution guarantees the vote to all its citizens, since 1980, but which has failed to ever implement this provision. Zimbabwe is one of several Sub-Saharan states that enfranchised their diaspora as part of their first post-independence constitutions, without ever actually implementing this provision.

### ***Category 3: Partial Limits (De Jure or De Facto)***

Partial reactive limits occur when the enfranchisement law is officially in effect, but voter suppression mechanisms significantly limit diaspora participation through extra-judicial bureaucratic requirements, through a faulty implementation of electoral laws, sabotage and inadequate voting conditions.

This is the case with Cameroonian diaspora voters who need 'consular cards' in order to be allowed to vote. These cards are issued by their embassy only to some emigrants, considered home-government friendly. Those who arrived abroad as a result of their opposition to current

president's Biya prolonged and unconstitutional tenure in office (and who were political asylum seekers) are denied access to such cards and thus denied the right to vote (Takougang, 2014).

When diaspora enfranchisement legislation was passed, in 2011, it did not contain any provisions for such consular cards. This requirement, which is blatantly exclusionary and based on partisan discrimination, “mirrors the challenges the country has been facing in terms of democratization for the 33 years Biya has been in power” (personal interview with Dr. Christopher Fomunyoh, May 8, 2015.)

De facto voter suppression also happened in the case of the 2012 Romanian legislative elections and the 2014 Romanian presidential election. In 2012, the Ministry of Foreign Affairs required poll workers to ask citizens for proof of legal status in the country where they were casting their ballot, and not to allow them access to the polls unless such proof was presented. This practice was contrary to the law, which states that any Romanian citizen with a valid ID has the right to vote in general elections abroad. In fact, the requirement disenfranchised hundreds of thousands of Romanians (an estimated three hundred thousand in Spain alone), who had overstayed their visas or work permits in the United States and Western Europe.

De facto disenfranchisement also happened during the 2014 presidential elections, when tens of thousands of Romanian emigrants were prevented from voting by long lines at embassies and consulates. The lines were the result of unprecedented, time consuming, extrajudicial bureaucratic requirements that significantly slowed down the voting process. The Romanian government claimed the “unexpected high turnout”, and promised that every emigrant “who wants to vote would be able to vote” in the second round of the election, which took place two weeks later. Still, the same unfounded bureaucratic requirements were left in place for the second round of voting, with more than half of those who waited in lines for eight or nine hours not managing to cast a vote before polls were closed.

De jure reactive partial retrenchment happens when the number representatives in the sending country's parliament may be limited due to low diaspora voter turnout in previous elections. This is the case in Croatia. In the early 1990s, Franjo Tudjman's nationalist party, the Croat Democratic Union (Hrvatska Demokratska Zajednica – HDZ), passed a law enfranchising Croats living abroad, most of whom had nationalist leanings during that time of conflict. The law created twelve seats in parliament for Croats living abroad, out of 127 total. At that time, the Croat Citizenship Law granted citizenship to any person who signed a personal declaration affirming that they were Croat. More than 300,000 people from neighboring Bosnia-Herzegovina acquired citizenship during that time, and it was estimated that 400,000 Croats living abroad were of voting age (IDEA, 2007).

In 1999, a new electoral law was passed that did away with the fixed number of external seats. “Instead, a new allocation procedure made the number of external seats dependent on the ratio of the number of external valid votes to the total number of domestic valid votes” (IDEA, 2007, p. 72) The law allows for a maximum number of six seats for the diaspora, but the actual number varies from one election to the next and is calculated by taking “into account the number of votes cast abroad and the average number of votes needed to obtain a seat in-country.” Thus, “the number of external seats [... was] not settled a priori, but [...] depend[ed] on the relation between the actual number of external voters and the number of in-country valid votes.” (IDEA 2007, p 29 &70)

As turnout abroad has been decreasing from 35.2% in the 2000 elections to 17.8% in 2003, and 22.3% in 2007, the number of seats allocated for the diaspora has diminished as well: from

twelve, to six, to four seats. Eventually, the Croat parliament passed new legislation in 2011, restricting diaspora representation in parliament to three fixed seats, which make “the diaspora’s electoral participation completely irrelevant, since the three diaspora representatives can be elected by [a] hundred, ten thousand or hundred thousand voters” (Kasapovic, 2012, p.786)

#### ***Category 4: Residency Sunset Limits***

Residency sunset limits are put in place when sending countries condition diaspora voting on the length of a citizen’s residency abroad. Such clauses are sometimes included in the initial enfranchisement legislation. The 1985 German law enfranchising diaspora voters placed a ten-year residency restriction on voters. In 1998 the provision was prolonged from ten to twenty-five years, only to be declared unconstitutional by the German Constitutional court, which in 2008 completely withdrew the right to vote of Germans abroad. New legislation, passed in 2013, re-instituted the right to vote for those Germans who have lived outside of the country for less than 25 years.<sup>2</sup> Canada automatically included a five-year foreign-residency restriction in its initial enfranchisement law of 1993. In Australia, an original three-year foreign-residency limit for ‘overseas electors’ was increased to six years in 1998 (Orr, 2014).

In other cases, residency limits are added after the original enfranchisement legislation was adopted, as was the case in New Zealand and in Britain. New Zealand enfranchised its citizens abroad (who were not members of its military or government workers) in 1956, but added a three-year foreign-residency limit in 1993.<sup>3</sup> This as diaspora voters have had a significant impact on elections outcomes and coalition formation, and have influenced and interacted with political parties to a considerable extent (Gamlen, 2015). Yet, the three years requirement is rather lax, since it can be met through a simple visit to the country. At the same time, New Zealand is one of the most lenient countries when it comes to external voting, which is permitted even to non-citizen permanent residents.

In the year 2000, Great Britain cancelled voting rights for any citizen who has been a resident abroad for more than fifteen years. Five and a half million British citizens live abroad, most of them in Australia, Spain, Expatriates first gained the right to vote abroad in 1985, if residing abroad for five years or less. Residence requirements were extended to twenty years in 1989 by the Representation of the People Act, to be reduced to the current limit in 2000, by the Elections and Referendums Act.<sup>4</sup>

The categories above helped classify reactive limits in accordance to two sets of criteria: legality and impact. Legal reactive limits are officially sanctioned through inclusion in legislation added to original enfranchisement laws. Extra-judicial limits have no legal basis. The second criterion examines impact: how many emigrants are affected by each category of reactive limits

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<sup>2</sup> [http://www.bundesverfassungsgericht.de/entscheidungen/cs20120704\\_2bvc000111.html](http://www.bundesverfassungsgericht.de/entscheidungen/cs20120704_2bvc000111.html) and <http://dipbt.bundestag.de/dip21/btd/17/118/1711820.pdf> Accessed 05/08/2015

<sup>3</sup> <http://www.legislation.govt.nz/act/public/1993/0087/latest/DLM308839.html> Accessed 05/08/2015

<sup>4</sup> European Court of Human Rights: <http://www2.bailii.org/eu/cases/ECHR/2010/2222.html> Accessed 03/02/2012.



**Table 1. Reactive Limits: Criteria and Cases**

	<b>Legal Limits (De Jure)</b>	<b>Extra-judicial Limits</b>
<b>Full Impact</b>	Category 1 <i>(Armenia, Morocco, Cook Islands)</i>	Category 2 <i>(Mozambique, Zimbabwe)</i>
<b>Partial Impact</b>	Category 3 <i>(Croatia)</i>  Category 4 <i>(New Zealand, Canada)</i>	Category 3 <i>(Cameroon, Romania)</i>

***Causes: The Cost-Benefit Argument***

The next step in understanding reactive limits is determining what causes them. An intuitive explanation would point towards the same factors that are generally believed to inform proactive limits: costs, benefits, political and electoral impact of the diaspora vote, as well as normative and diffusion considerations. The main difference here is that reactive limits are supposedly backed by experience. In most cases discussed below, reactive limits are justified by government and political leaders in terms of negative experiences with diaspora enfranchisement, where turnout was low and organizational costs were high. Cost-benefit calculations played, in the view of many authors, an important role in states’ original decision to enfranchise emigrants (Itzighson, 2000; Gamlen, 2006; De Haas, 2005; Kapur and Singer, 2006; Escobar, 2007; Wucker, 2004; Demmers, 2007; Landolt and Goldring, 2010; Leblang, 2010; Cisterino, 2011). States claim to weigh the costs of organizing elections abroad with likely turnout rates. In this respect, an active diaspora, lobbying intensively for such rights, sends a promising signal of likely high levels of interest and electoral participation that can encourage states’ pro-enfranchisement decisions (King and Melvin 1991; Itzighson 2000; Baubock 2005; Fox 2005; Escobar 2006; Gamlen 2008; Ciornei 2010).

Low turnout is the argument most often invoked by sending states to justify the adoption of retroactive limits. Government officials contrast high organizational costs with ‘disappointing’ turnout results to justify most retrenchment decisions. High institutional costs were invoked as the causes for retroactive limits imposed by the Cook Islands, where diaspora voting rights were revoked as part of a larger program to reduce the size of public institutions (fewer seats in parliament, fewer ministries in the executive, lower institutional expenditure). In Mozambique, Renamo (The Mozambican National Resistance) invoked low diaspora registration in the 1997 elections as a reason for cancelling diaspora voting in 2000 and 2004. The party presented its case in front of the National Electoral Commission, contrasting electoral costs with low registration numbers. The NEC suspended the 2000 elections abroad, but allowed the diaspora to vote in the 2004 election, when registration increased by about 45% compared to 1997, and turnout among those registered was 30% higher than the in-country turnout. British Conservatives, who were not in power at the time, expressed support for reactive limits introduced by the Elections and Referendum Act of 2000, by invoking expats’ disappointing registration and turnout numbers in previous elections: they “were disappointed by the very low take-up of overseas registration” (IDEA, 2007, p.44).

Claims of retrenchment decisions caused by ‘high organizational costs-low registration/turnout/participation’ are as widely used by politicians as they are questionable. For one, high organizational costs of external elections can be securely and efficiently reduced through postal, proxy or electronic voting, yet very few countries practice this type of affordable long-distance voting (Turcu and Urbatsch, 2015). In the case of the seventeen countries studied in detail here, only the UK and New Zealand allow for postal voting, while no one allows for electronic or proxy voting. Thus, stated cost concerns are not accompanied by the actions that would demonstrate serious attempts to reduce such costs, while still maintaining diaspora enfranchisement rights intact. Claimed low-turnout concerns are also rather unfounded, given that countries have in place pro-active limits such as active registration, that discourage turnout, rather than facilitating it (Hutcheson and Arrighi, 2015), and given that many countries do not have good diaspora size estimates in place and their turnout percentage calculations are oftentimes inaccurate.

In fact, far from being apathetic, diasporas have been quite involved: documented instances of protest, petitions and mobilization in opposing reactive limits, suggest high levels of diaspora political engagement. In the case of the UK, expats, organized in action groups sometimes affiliated with British political parties, have petitioned the government against reactive limits. Several legal cases were brought with Britain’s High Court and the European Court of Human Rights against this decision by disenfranchised British citizens who still pay taxes to Britain, even though they are long-term foreign residents, and who regard the latest limits as an abuse. Cook Islander emigrants actively petitioned their government to renounce increasingly restrictive registration and residency limits, as well as the decision to revoke the diaspora vote in 2003, while Mozambicans abroad protested the NEC’s decision to disallow diaspora voting in the 2000 elections.

The weaknesses of the cost-benefit (high organizational cost-low turnout/participation) argument would suggest that, in spite of being the most readily invoked reason for reactive limits on diaspora voting, it is not one of its causes.

### ***Causes: Political and Economic Calculations***

Electoral and political calculations have been discussed in the literature as proactive limits. These calculation are most likely to motivate authorities to seek limits, especially when they are concerned that the diaspora might be pivotal in election outcomes through swamping or tipping the vote (Baubock, 2009). Swamping may occur at the hands of a large diaspora, whose numerous votes might dilute the impact of at-home voters, while tipping would be the impact of an active, ideologically cohesive diaspora, likely to influence election results.

As such, political calculations and electoral interest have been claimed as the most significant (proactive) determinants of diaspora enfranchisement decisions (Lafleur, 2013). Political parties’ interests (Bunce and Wolchik, 2006; Rhodes and Harutyunyan, 2010), regime and institutional preferences or changes (Escobar 2007; Lafleur 2013) and parties’ electoral calculations (Verdery 1998; Acemoglu and Robinson, 2000; Levitt and de la Dehesa, 2003; Ansell and Samuels 2010) have supposedly motivated many governments’ enfranchisement strategies. Thus, enfranchisement decisions were oftentimes connected to certain expectations of political support or electoral gains, or even with a “variety of anxieties among political elites” (Lafleur, 2015), especially in cases where the diaspora vote was deemed quite unpredictable.

The parties most likely to promote diaspora enfranchisement were the ones which also believed to have most support abroad and thus most to gain from this enfranchisement. This was the case with British Conservatives, the Croatian Democratic Union (HDZ), the Mozambican Liberation Front (Frelimo) and many others. "...[O]nce homeland political parties determine what the potential impact of the addition of external votes on the overall electoral results will be, they will support or block legislation according to expected electoral gains or losses" (Lafleur, 2011 p.483).

Sometimes, parties that were in power while massive emigration occurred are less likely to support diaspora rights, fearing the resentment of emigrants who might attribute their decision to emigrate to the ruling party's inadequate policies. This is was the case with ARENA, the ruling party in El Salvador, which for years opposed voting rights for the Salvadoran diaspora which had formed during its brutal rule (Itzigsohn, 2000). In the Dominican Republic, ruling parties fearful of the impact of diaspora voting opposed granting electoral rights to emigrants, or even allowing double citizenship (Escobar, 2006). In Spain, Franco's regime denied Spaniards residing in Europe citizenship rights that were granted to Spaniards residing in Latin America. The ruling regime's relationship with the diaspora, as well as with the host country, played a major role in this decision (Rhodes and Hartutyunyan 2010). The PRI feared external voters, and did not grant them voting rights, during its uninterrupted 71-year rule of Mexico (Calderon Chelius and Martínez Cossío, 2004). The fact that Italian fascists had encouraged their strong base of external voters to participate in national elections created a stereotype of the external voter that shaped the country's resistance to external voting rights after WWII. Center-right parties also played a major role in Belgium by repeatedly introducing legislation favoring external voting, while socialists opposed it for decades. Eventually, leftist parties "supported it when it looked as if it would benefit [them]" (Lafleur, 2011, p.494).

When parties (especially ruling parties) feel threatened by external votes, they can choose one of three strategies to address this perceived threat. All three strategies hinge on context. First, if the diaspora does not already enjoy voting rights, the ruling party is likely to oppose them. Second, if rights do not exist, parties sometimes agree to grant such rights under certain circumstances, which in this paper are known as proactive limits. Third, if the diaspora already enjoys voting rights, parties seek to attract diaspora members into the rank and file of the party, to campaign and to open party offices and branches abroad (Itzigsohn, 2000; Lafleur, 2011).

Overall, when competitive parties have a stake in external voting rights, they are likely to at least seek to influence emigrants' access to the ballot box. The literature shows them doing so by delaying, sabotaging, or changing enfranchisement laws through proactive limits. But, oftentimes, they have the incentive to do so through reactive limits as well. This is especially true with parties that have a contentious or difficult history with the diaspora, or in cases when the diaspora is inclined to overwhelmingly support an opposing party.

Electoral calculations and political interests emerge as likely causes for reactive limits across all four categories described in this paper. Armenians abroad have called for enfranchisement as recently as 2013, claiming that their widespread support of the country's main opposition party had led to the 2007 strict retrenchment provisions that only allow embassy and governmental workers to cast a vote outside of the country.<sup>5</sup>

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<sup>5</sup> Radio Free Europe Interview: <http://www.rferl.org/content/armenia-expatriates-voting/24903351.html> Accessed 05/08/2015

At the same time, the failure to implement enfranchisement laws in Zimbabwe is likely due to an ever growing diaspora, which is dissatisfied with the country's dictatorial leadership and its poor economic development and would be sure to vote against the country's leaders. Thus, the government only allows the external vote to government employees, who typically work in consulates and embassies abroad and are political appointees and loyalists of the ruling party (Hartmann, 2015).

In Mozambique, Renamo, the major opposition party, invoked low diaspora registration to justify its successful attempt to stop external voting in the 2000 elections. Thanks to its control of several members of the National Electoral Commission, Renamo achieved what it considered a tactical victory, as the diaspora's support for the ruling party Frelimo, had been widely documented. Thus, low registration and high expenditure concerns were only employed to abscond the real motivation for stopping the external vote, which were in fact connected to electoral concerns.

In the early 2000s, parties of the Croatian Left advocated for changes to the electoral system and reforms to the number of seats diaspora representatives would hold in the national legislature, well being aware of the strong ties between the diaspora and the right wing HDZ, which has consistently attracted 80-90% of the diaspora vote. Enfranchisement had clearly been politically motivated in the 1990s: "The opposition claimed that the incumbents [HDZ] allowed this [lax citizenship law] trusting that the Croats in Herzegovina would vote in favor of nationalist parties" (IDEA 2007, p.208). This proved to be true, as the HDZ won the external vote and secured the twelve external constituency seats and, with them, parliamentary majority in the 1995 elections. Thus, the Left pushed for continued electoral reforms which eventually limited diaspora representation to three fixed seats (as described above) and limited its influence in the Croat Parliament (Ragazzi, 2011; Kasapovic, 2012). Still, the diaspora reaffirmed some of its political clout by giving the HDZ candidate the slim margin (thirty thousand votes) that allowed her to become the country's new president in 2015.

Most of the Cameroonian diaspora is made up of dissidents who protested president Biya's rule throughout the 1990s, after the rigging of the 1992 elections, and later fled the country seeking political asylum in the US and France. This dissident diaspora has repeatedly demonstrated for the expansion of diaspora voting rights at international events attended by the Cameroonian president. In 2008, Biya abusively changed the constitution in order to stay in power, leading to renewed protests abroad and renewed pressure for enfranchising the diaspora. In 2010, he announced he was ready to listen to the country's vocal diaspora and announced his readiness for diaspora enfranchisement. The law passed in the legislature in 2011, but the implementation was fraught with irregularities, including the consular cards requirement discussed above, which in essence exclude most diaspora members, who are political dissidents and asylees, or are known opponents of the Biya regime.

In the case of Romania, a politically active diaspora, that had changed the outcome of the 2009 presidential election, faced sabotage-like reactive limits during the two rounds of the 2014 presidential elections. These elections were organized by the government of PM Victor Ponta (leader of Romania's largest left wing party, PSD), who was also one of the top contenders for the presidency. Ponta was painfully aware of his lack of popularity in the diaspora and wary of the diaspora's proven ability to dramatically overturn election results. Thus, under his leadership, the Ministry of Foreign Affairs created a series of extra-judicial polling guidelines that slowed down the voting process from about ninety seconds per ballot cast (2009) to about 10-12 minutes per ballot cast in 2014. This led to waiting times of 7-8 hours for hundreds of thousands of

Romanians who queued for kilometers in front of embassies across Western Europe and North America. When the polls closed, more than half of those who had queued all day had not voted. In spite of street protests in Romania and abroad and repeated official reassurances that all emigrants would be able to vote during the second round, two weeks later, the same bureaucratic requirements kept even more willing voters away from the ballot box. These acts of blatant extra-judicial bureaucratic sabotage were meant to keep diaspora votes to a minimum and reduce their impact on the elections overall. Still, this strategy backfired, as it had an unexpected effect on voters at home. Apathetic voters, who had not turned up for the first round, were now outraged by the sabotage experienced by the diaspora, and perhaps so inspired by emigrants' stubborn determination to wait in line for hours to cast their ballot. As a result, in-country turnout in the second round was 62.04%, the highest since the 2000 elections, and 9 percentage points higher than in the first round. Also, the results generated a major upset: from a comfortable lead by 10% in the first round, Ponta lost to Iohannis, the Center Right candidate, by 10%. In the diaspora, 9% voted for Ponta, 91% for Iohannis. Ponta lost the presidential election, but continued to serve as the country's PM. Recently, his government drafted legislation that would require all Romanian emigrants to register with the Romanian authorities thirty days prior to any election. Not surprisingly, the proposed registration procedure is extremely cumbersome.

As seen from the cases presented above, political effects of diaspora involvement are a key determinant of reactive limits when they are perceived as strongly affiliated with one party or one side of the political spectrum (Armenia, Romania, Croatia, Zimbabwe, Cameroon, UK); and when they are perceived as having possible "swamping or tipping" (Baubock, 2007) powers (Armenia, Cook Islands, Romania 2009, 2014; Croatia 2015).

Sometimes, party leaders or government officials justify imposing reactive limits with normative considerations (Hutcheson and Arrighi, 2015) that poorly mask obvious political strategizing. Normative considerations state that non-resident citizens should not have as much influence on elections and, indirectly, laws and policies as resident citizens do, or that representation in national parliaments should not be the same for external and internal citizens (Dahl, 1989; Goodin, 2007; Baubock, 2009; Owen, 2009; Hutcheson and Arrighi, 2015).

For example, Armenia's 2007 Electoral Law, which completely retrenched diaspora voting rights, stated that "Armenians abroad should not have any major say in deciding on the leadership and fate of Armenia, [...] this should be the exclusive right of Armenians living in Armenia" (IDEA 2007, p.53). In fact, the retrenchment was motivated by the leading party's awareness of the willingness and ability of the diaspora to vote it out of power (as mentioned in the case study above). The same was the case with left-wing party leaders in Croatia (2015) and Romania (2009 and 2014), who, after losing elections due to diaspora 'tipping' results, questioned both the legitimacy of emigrants' voting rights, and that of their ability to decisively impact policy making in a country they chose to leave behind. Such normative considerations may be rooted in legitimate concerns about belonging, citizenship, and the ability to shape legislation that does not directly affect voters' daily lives. Yet, the fact that most normative claims are made by government officials in the aftermath of losing elections, somewhat undermines these claims.

### ***Causes: Norm Diffusion***

Given that democratic norm diffusion has been found to increase the likelihood of enfranchisement, does it also have any impact on a state's decisions to adopt reactive limits?

Norm diffusion arguments (Rhodes and Harutyunyan, 2010) typically explain diaspora enfranchisement through a countries' desire to a) signal compliance with international democratization norms; and b) through 'neighbor effects', where countries are twice more likely to enfranchise their diasporas if their neighbors have done so as well (Turcu and Urbatsch, 2015).

*a) Signaling Compliance*

Signaling may not always be the result of a sincere desire for democratization. Deceptive signaling, occurs when international norms become national laws that are not being implemented or are being sabotaged by the very government which adopted and is supposed to implement them. This happens, for example, in the case of countries that invite international observers to monitor their elections, in spite of their plan to rig such elections (Hyde, 2011). Or in cases of "dictatorships that practice torture [which] are twice more likely to accede to the UN convention against torture than dictatorships that do not practice torture" (Vreeland, 2008). Deceptive signaling also happens when countries sign international human rights agreements, but never follow through with implementation. This "paradox of empty promises" (Hafner-Burton and Tsutsui, 2005) emphasizes the disconnect between countries' commitments to international norm regimes and actual norm implementation. In such scenarios, governments "decouple policy from practice", as a matter of international "window dressing" (Idem). For them, sending deceptive signals of international norm compliance is important in order to secure benefits, such as favorable trade agreements, or international aid (Hafner-Burton, 2005).

Such deceptive signaling is mostly encountered in category 2 and 3 reactive limits: Zimbabwe, Angola, Guinea-Bissau all fake compliance with international standards, but in fact do not implement their own laws, while Cameroon and Romania sabotage their own diaspora's participation, in spite of their own legislation. In Cameroon, president Biya's attempts at maintaining a semblance of democracy through such deceptive signaling strategies has long been deplored by his critics in the Cameroonian diaspora. The dictator, who has been in power in Cameroon for 33 years, is "hooked on foreign aid" and likes being invited to high-level meetings in the United States, France and other Western countries, hence his efforts to signal commitments to democratic standards (personal interview with Dr. Christopher Fomunyoh, May 2015). Thus, deceptive signaling practices emerge as a likely cause especially for category 3 reactive limits.

*b) Neighbor Effects*

Given neighbors' influence on enfranchisement, could the same neighbor effect inform countries' decisions to adopt reactive limits? If neighboring countries have an effect on enfranchisement, they may influence a country's decision to impose reactive limits. Based on the neighbor effect findings (Turcu and Urbatsch, 2015), it might be assumed that neighbors' low levels of commitment to democracy may correlate with a country lowering of its own standards and imposing stricter reactive limits.

Findings in the table below indicate a correlation between the severity of reactive limits (grouped by the categories created in this paper, 1 through 4) and democratization levels in neighboring countries. States with more restrictive limits tend to be surrounded by less democratic neighbors than states with less restrictive reactive limits.

**Table 2: Severity of Reactive Limits and Neighboring States' Average Democratization Levels\***

<b>Limits Category (Strictest = 4 to Most Lenient = 1)</b>	<b>Neighbors' Average Democratization Scores (Least Democratic = 1 to Most Democratic = 7)</b>
<b>4 (voting revoked)</b>	<b>3.6</b>
<b>3 (voting not implemented)</b>	<b>3.9</b>
<b>2 (voting partially restricted)</b>	<b>4.7</b>
<b>1 (residency sunset laws)</b>	<b>7.0</b>

\*See Appendix for table of individual neighbors' democratization scores.

### **Findings and Conclusions**

Reactive limits are strongest and most prevalent in countries where diasporas influenced electoral outcomes in the past, where diasporas have swamping or tipping potential, or where diasporas have proven strong ideological preferences for either the opposition, or the ruling party. These preferences and the ability to influence electoral outcomes seem to have motivated reactive limits in most, if not all cases discussed here. For example, in Armenia, Cameroon and Zimbabwe, authoritarian or semi-authoritarian leaders know that a diaspora made up of dissidents would overwhelmingly vote against them. Parties of the left in Romania, and Croatia know that they only garner a small percentage of the diaspora vote, while the main opposition party in Mozambique seeks to have limits imposed on a diaspora that always votes in favor of the ruling party. In New Zealand, the diaspora has shaped electoral outcomes and political calculations in many instances, but the lack of a clear ideological preference has led to all parties trying to court diaspora voters, and limits were rather normative than electoral in nature.

Turnout and costs, as well as normative considerations are invoked as causes in most cases, but usually they mask concerns for political and electoral outcomes. In fact, most countries have not shown an effort to reduce costs by introducing postal or electronic voting. Thus, cost-benefit claims, made by UK Conservatives, Renamo party members in Mozambique, members of the Social Democratic Party (left wing) in Croatia and Cook Islands leaders, do not come across as the main reason for reactive limits imposition. Norm diffusion effects play a larger role when neighbors' democratization levels are considered. Countries tend to have stronger retroactive limits in place if they are located in a less democratic neighborhood.

In conclusion, cases where reactive limits do exist are mostly motivated and explained by these factors in order of importance: (potential) political effects and electoral considerations (swamping and tipping) and, to some extent, norm diffusion and international signaling considerations. These causes are in stark contrast with those most often invoked when reactive limits are imposed: costs, turnout and normative considerations.

## References

- Acemoglu, Daron, and James A. Robinson. "Why did the West extend the franchise? Democracy, inequality, and growth in historical perspective." *Quarterly Journal of Economics* (2000): 1167-1199.
- and facts. *Third World Quarterly*, 26, 1269-1284.
- Ansell, Ben, and David Samuels. "Inequality and democratization: A contractarian approach." *Comparative Political Studies* (2010).
- Arrighi, Jean-Thomas, et al. "Franchise and electoral participation of third country citizens residing the European Union and of EU citizens residing in third countries." (2013).
- Bauböck, Rainer. "Expansive citizenship—voting beyond territory and membership." *Political Science and Politics* 38.04 (2005): 683-687.
- Bauböck, Rainer. "Stakeholder citizenship and transnational political participation: a normative evaluation of external voting." *Fordham L. Rev.* 75 (2006): 2393.
- Bauböck, Rainer. "The rights and duties of external citizenship." *Citizenship studies* 13.5 (2009): 475-499.
- Blais, André, Louis Massicotte, and Antoine Yoshinaka. "Deciding who has the right to vote: a comparative analysis of election laws." *Electoral studies* 20.1 (2001): 41-62.
- Bunce, Valerie J., and Sharon L. Wolchik. "International diffusion and postcommunist electoral revolutions." *Communist and Post-Communist Studies* 39.3 (2006): 283-304.
- Calderón Chelius, Leticia, and N. Martínez Cossío. "La democracia incompleta: la lucha de los Mexicanos por el voto en el exterior." *Calderón Chelius, L., Votar en la distancia: la extensión de los derechos políticos a migrantes, experiencias comparadas, México: Instituto Mora* (2004): 217-67.
- Ciornei, Irina. (2010, October). Political parties and transnational communities. A contextual analysis of British and Romanian Residents in Spain. Paper presented to Jornadas Políticas Migratorias, Justicia y Ciudadanía [Conference on Migratory Policy, Justice and Citizenship], Madrid, Spain
- Cisterino, Janna. "Engaging the diaspora: Prospects and pitfalls." *The Proceedings of GREAT Day* (2011): 179-197.
- Dahl, Robert. "A.(1989): Democracy and Its Critics." *New Haven, Yale University*.
- De Haas, H. (2005). International migration, remittances, and development: Myths
- Demmers, Jolle. "New wars and diasporas: suggestions for research and policy." *Journal of Peace, Conflict and Development* 11 (2007).
- Ellis, Andrew, et al. *Voting from abroad: The International IDEA handbook*. International Idea, 2007.
- Escobar, C. (2006). Migration and citizen rights: The case of Mexico. *Citizenship Studies*, 10, 505-523.
- Escobar, C. (2007). Extraterritorial political rights and dual citizenship in Latin America. *Latin American Research Review*, 42, 43-75.
- Fomunyoh, Christopher, Personal Interview, May 8, 2015.



- Fox, Jonathan. "Unpacking transnational citizenship." *Annual review of political science* 8 (2005).
- Gamlen, Alan. "The emigration state and the modern geopolitical imagination." *Political Geography* 27.8 (2008): 840-856.
- Gamlen, Alan. "The impacts of extra-territorial voting: Swings, interregnums and feedback effects in New Zealand elections from 1914 to 2011." *Political Geography* 44 (2015): 1-8.
- Gamlen, Alan. (2006, August). Diaspora engagement policies: What are they and what kind of states use them? (Working Paper No. 32). Oxford, UK: Centre on Migration, Policy and Society, Oxford University.
- Goodin, Robert E. "Enfranchising all affected interests, and its alternatives." *Philosophy & public affairs* 35.1 (2007): 40-68.
- Grace, Jeremy. "External and absentee voting." *Challenging the norms and standards of elections administration* (2007): 35-57.
- Hafner-Burton, Emilie M. "Trading human rights: How preferential trade agreements influence government repression." *International Organization* 59.03 (2005): 593-629.
- Hafner-Burton, Emilie M., and Kiyoteru Tsutsui. "Human Rights in a Globalizing World: The Paradox of Empty Promises1." *American journal of sociology* 110.5 (2005): 1373-1411.
- Hartmann, Christof. "Expatriates as voters? The new dynamics of external voting in Sub-Saharan Africa." *Democratization* ahead-of-print (2015): 1-21.
- Hutcheson, Derek S., and Jean-Thomas Arrighi. "'Keeping Pandora's (ballot) box half-shut': a comparative inquiry into the institutional limits of external voting in EU Member States." (2015).
- Hyde, Susan D. "Catch us if you can: Election monitoring and international norm diffusion." *American Journal of Political Science* 55.2 (2011): 356-369.
- Itzigsohn, J. (2000). Immigration and the boundaries of citizenship: The institutions of immigrants' political transnationalism. *International Migration Review*, 34, 1126-1154
- Jaulin, Thibaut. "Géographie du vote à distance: l'élection tunisienne de 2011 à l'étranger." *L'Espace Politique. Revue en ligne de géographie politique et de géopolitique* 23 (2014).
- Kapur, D., & Singer, D. A. (2006, March 22-25). Remittances, government spending and the globaleconomy. Paper presented to the International Studies Association Annual Meeting, San Diego.
- Kasapović, Mirjana. "Voting rights, electoral systems, and political representation of diaspora in Croatia." *East European Politics & Societies* 26.4 (2012): 777-791.
- King, Charles, and Neil J. Melvin. "2000. Diaspora Politics: Ethnic Linkages." *Foreign Policy, and Security in Eurasia. International Security* 24.3 (1999): 108-138.
- Lafleur, Jean-Michel. "The enfranchisement of citizens abroad: variations and explanations." *Democratization* ahead-of-print (2015): 1-21.
- Lafleur, Jean-Michel. *Transnational politics and the state: The external voting rights of diasporas*. Routledge, 2013.
- Landolt, Patricia, and Luin Goldring. "Political cultures and transnational social fields: Chileans, Colombians and Canadian activists in Toronto." *Global Networks* 10.4 (2010): 443-466.

- Leblang, David. "Familiarity breeds investment: Diaspora networks and international investment." *American Political Science Review* 104.03 (2010): 584-600.
- Levitt, Peggy, and Rafael De la Dehesa. "Transnational migration and the redefinition of the state: variations and explanations." *Ethnic and racial studies* 26.4 (2003): 587-611.
- Nohlen, Dieter, and Florian Grotz. "The legal framework and an overview of electoral legislation." *Draft Chapter for International IDEA: External Voting Handbook* (2007).
- Orr, Graeme. "Citizenship, Interests, Community and Expression: Expatriate Voting Rights in the Australian Election. In book: "Citizenship in a Post-National World: Australia and Europe Compared", Edition: Law and Policy Paper # 29, Publisher: The Federation Press, Editors: Kim Rubinstein and Simon Bronitt, pp.24-37 (2014).
- Owen, David. "Resident aliens, non-resident citizens and voting rights: towards a pluralist theory of transnational political equality and modes of political belonging." (2009): 52-73.
- Ragazzi, Francesco Rossi, and Kristina Balalovska. "Diaspora politics and post-territorial citizenship in Croatia, Serbia and Macedonia." (2011).
- Rhodes, Sybil, and Arus Harutyunyan. "Extending citizenship to emigrants: Democratic contestation and a new global norm." *International Political Science Review* 31.4 (2010): 470-493.
- Shaw, Jo. *The transformation of citizenship in the European Union: electoral rights and the restructuring of political space*. Cambridge University Press, 2007.
- Takougang, Joseph. *Cameroonian Immigrants in the United States: Between the Homeland and the Diaspora*. Lexington Books, 2014.
- Turcu, Anca, and R. Urbatsch. "Diffusion of Diaspora Enfranchisement Norms A Multinational Study." *Comparative Political Studies* 48.4 (2015): 407-437.
- Verdery, Katherine. "Transnationalism, nationalism, citizenship, and property: Eastern Europe since 1989." *American ethnologist* 25.2 (1998): 291-306.
- Vreeland, James Raymond. "Political institutions and human rights: Why dictatorships enter into the United Nations Convention Against Torture." *International Organization* 62.01 (2008): 65-101.
- Wucker, Michele. "Remittances: the perpetual migration machine." *World policy journal* (2004): 37-46.

Appendix

Country & Category	Neighbors	Democracy Index
<b>Armenia (4)</b>	Georgia	5
	Azerbaijan	2
	Turkey	5.5
	Iran	2
	<b>Average</b>	<b>3.625</b>
<b>Mozambique (3)</b>	Tanzania	5
	Malawi	4
	Zambia	4
	Zimbabwe	1
	South Africa	6
	Sawaziland	2
	<b>Average</b>	<b>3.667</b>
<b>Angola(3)</b>	Zambia	4
	Namibia	6
	DRC	2
	<b>Average</b>	<b>4</b>
<b>Zimbabwe (3)</b>	Zambia	4
	Botswana	5
	South Africa	6
	Mozambique	4
	<b>Average</b>	<b>4.75</b>
<b>Guinea-Bissau(3)</b>	Senegal	6
	Guinea	3
	<b>Average</b>	<b>4.5</b>
<b>Sierra Leone(3)</b>	Guinea	3
	Liberia	4
	<b>Average</b>	<b>3.5</b>
<b>Ghana(3)</b>	Togo	4
	Burkina Faso	2
	Cote d'Ivoire	3
	<b>Average</b>	<b>3</b>
<b>Cameroon (2)</b>	Nigeria	4
	Equatorial Guinea	1
	Gabon	4

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	DR Congo	2
	Chad	3
	Central African Republic	1
	<b>Average</b>	<b>2.5</b>
<b>Croatia(2)</b>	Serbia	-
	Slovenia	7
	Hungary	6
	Bosnia Herzegovina	6
	<b>Average</b>	<b>6.333</b>
<b>Romania(2)</b>	Serbia	-
	Bulgaria	6
	Hungary	6
	Ukraine	5
	Moldova	5
	<b>Average</b>	<b>5.5</b>
<b>United Kingdom* (1)</b>	Belgium	<b>7</b>
<b>New Zealand*(1)</b>	Australia	<b>7</b>

\*UK and New Zealand measurements based on country with nearest capital city to their own.